

FY16 National Strategy Regional Oversight Plan Region 7

Program	Significant Issue	Corrective Measures/Escalation Approach with Timeframes
CAA - MO		
	Missouri does not have an official penalty policy. Without administrative authority to assess penalties, or a penalty policy to uniformly define penalties for violations, the penalties assessed by MDNR programs tend to be low and do not formally include both gravity and economic benefit.	The state and region continue to work towards development of coordinated policy.
CWA - IA		
	Iowa MOA is expired.	EPA and state are very close to completing negotiations on a new MOA. We will continue to monitor this project to ensure completion.
	Petition to withdrawal Iowa NPDES program due to deficiencies in CAFO program.	EPA continues to provide close oversight of the IDNR workplan implementation providing feedback to the state to ensure adequate implementation.
CWA - KS		
	KDHE does not conduct MS4 inspections/audits.	Region 7 will review annual reports to identify MS4s that may require additional follow up by EPA.

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CWA-MO		
	Batching data from the state database (MoCWIS) to ICIS is resulting in errors that is causing erroneous information in ECHO.	<p>Region 7 is working with the state and has provided requested training. This is a finding in Round 3 SRF and it has also been incorporated into the PPG workplan to keep progress moving forward. Included in the SRF Action Plan are the following actions:</p> <ol style="list-style-type: none"> 1. MDNR should submit to the EPA a timeline of actions that will occur to correct the batch upload issues. Submit the timeline to the EPA with the first quarterly update (January 15, April 15, July 15, and October 15). 2. Report to the EPA at each quarter (January 15, April 15, July 15, October 15) the progress made to correct the MoCWIS issues. 3. MDNR should begin to batch all of these elements to ICIS-NPDES by September 30, 2015 to ensure that data will be complete and accurate, pursuant to the 1985 PCS Policy Statement and its appendices for ICIS-NPDES.
	The program has a penalty policy, however, penalties in administrative and judicial orders account for gravity, but most penalties did not ensure that economic benefit of noncompliance was recouped.	As part of the SRF Action Plan, MDNR will submit their completed amended penalty matrix sheets to the EPA by April 15, 2015. They will also submit a penalty which includes an economic benefit evaluation, and a penalty where economic benefit has been excluded, to the EPA by April 15, 2015.
SRF Cross Media	The Nebraska Legislature has not given NDEQ the authority to assess and collect fines and penalties. This has caused issues with timely and appropriate enforcement, lack of consideration for economic benefit and final penalty assessment reductions by the Attorney General's Office.	Absent new legislation giving NDEQ administrative enforcement authority, this will likely continue to be an issue.